

United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Sevier River Resource 150 EAST 900 NORTH RICHFIELD, UTAH 84701

APR 19 1990

IN REPLY REFER TO

3809 (U-0562)

Certified Mail No. 948965385 Return Receipt Requested

OIL, GAS & MINING

April 17, 1990

Mr. Dave Moody, Division Mining Engineer Georgia-Pacific Corporation P. O. Box 105605 Atlanta, Georgia 30348-5605

RE: Disposal of Waste Gypsum Wall Board, and Updating Mining Plan of Operation, UT-056-2P

Dear Mr. Moody:

The Bureau of Land Management conducted a compliance inspection under the 43 CFR 3809 Surface Management Regulations in December, 1989. On that inspection, we found that the plan of operations on file with the BLM does not fully cover your operations. In a letter, dated February 5, 1990, we requested Georgia-Pacific to submit, within thirty (30) days, information related to their mining operation. We have not received the complete information to date, and in further review, we are requesting additional information. We would like to update your plan and bring your operations into conformance with the regulations and your plan.

Mr. Brent Bastian, Quarry Manager, submitted the enclosed letter that addresses the disposal of waste gypsum wall board on mining claims at Georgia-Pacific Corporation's mining operations near Sigurd, Utah. This disposal of waste wall board on public lands has not been approved by the BLM and must be approved as a change in your plan of operation. In order for us to consider this change, the following additional information, at a minimum, must be submitted:

- Composition of the waste gypsum wall board.
- Raw materials, additives, chemicals, and other substances used to manufacture wall board from gypsum.
- Legal location of the disposal sites and approximate acreage.

- 4) Surface disturbance that existed at the disposal sites prior to the use of these locations for disposal. Were these locations mined out quarries or undisturbed lands?
- 5) Method proposed to reclaim these disposal sites.

Your approved plan, letter dated March 31, 1981 (copy enclosed), did NOT authorize the disposal of any litter, waste, or debris and required that all such materials be disposed at a proper landfill instead of on your mining claims. Your unauthorized disposal is a condition of noncompliance under the Surface Management Regulations (43 CFR 3809) and violates your approved plan of operations. This condition was brought to the attention of Georgia-Pacific in December, 1989. We must resolve this situation. The requested information must be submitted to us to evaluate a proposal to modify your plan of operations.

Enclosed are "Soil and Revegetation Recommendations" submitted by Mr. Bastian. These recommendations apparently were approved by the Division of Oil, Gas, and Mining, State of Utah. Is this the method and seed mixture currently used for reclamation of quarries and roads?

A copy of your plan of operations, approved by the BLM, is enclosed for your review. We have copies of your plans filed with DOGM in 1987 and 1988, and accept them as part of our case file. We request updated maps locating haul roads, gypsum quarries, and waste disposal sites. The enclosed maps, submitted as part of your plan of operations, do not have all these features located.

A threatened and endangered species, <u>Townsendia aprica</u>, was identified in the plan approval in 1981. This species has been removed from the T & E list and is not currently a sensitive species.

This information must be submitted to this office in a timely manner. We will allow you fifteen days from receipt of this letter to submit the requested information. If you have a problem with meeting this deadline, please notify us immediately.

If any data that you submit is considered proprietary, please identify it. At your request, it will be secured as confidential information and will be unavailable for public review.

Also, Federal regulations do not preempt State laws and regulations. Your modification will need to be evaluated by the Division of Oil, Gas, and Mining. The information you have already submitted and must now submit will be forwarded to that office by my staff. The Self Bond held by the State of Utah may also need to be re-evaluated.

Thank you for your cooperation in this matter. If you have any questions, please contact Michael Jackson, in the District Office, or Doug Thurman in this office. Both may be reached at (801) 896-8221.

Sincerely,

Area Manager

Enclosures as noted

CC: Brent Bastian, Georgia-Pacific Corporation

Wayne Hedberg, State of Utah, Division of Oil, Gas and Mining